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## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Ely Field Office

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Ely, Nevada 89301-9408

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In Reply Refer To:

1793 ( NV-043)

FEB 28 2000

Ms. Wendy R. Dixon, EIS Project Manager  
U.S. Department of Energy  
P.O. Box 30307  
North Las Vegas, NV 89036-0307

Dear Ms. Dixon:

In response to your request of August 6, 1999, the Ely Field Office of the Bureau of Land Management provides the following comments on the *Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.*

If you have any questions, please contact Sue Howle, Environmental Coordinator at (775) 289-1873.

Sincerely,

Gene A. Kolkman  
Field Manager

1 Enclosure  
1. Comments

## GENERAL COMMENTS

## Transportation

## 1 The Draft EIS:

- does not analyze the impacts of specific transportation routes of spent nuclear fuel (SNF) and high-level radioactive waste (HLRW). (P.2-44) DOE states "it cannot predict the specific transportation mode (truck or rail) of each shipment to the repository." Therefore, the transportation options outlined on page 2-44 do not accurately describe the transportation portion of the proposed action. Until DOE identifies specific transportation alternatives, it is impossible to predict the site-specific environmental impacts. This is also a violation of NEPA (deferring transportation decisions).

2 - fails to consider the impacts of legal-weight truck transportation through White Pine County, and even goes on to demonstrate (Table J-78) that the risks of transporting SNF and HLRW through the County are significantly greater than risks associated with current routes used to transport low level radioactive waste (LLWR). This could possibly warrant significant cumulative impacts.

3 - fails to provide a detailed description of rail line construction activities. (P.2-49) These construction activities will have environmental impacts, thus requiring biological and cultural clearances, and mitigation measures. Construction activities should be specified in order to fully analyze impacts as required by NEPA.

4 - mentions fence installation along the rail line (P. 2-50), but fails to include the location or fence type to be installed. This should be described in the proposed action as it could significantly impact wildlife, especially where the proposed rail line crosses habitat areas or migration routes.

5 - fails to quantify how many actual legal-weight truck haul loads could be expected through Ely on the US 93 or SR 318 scenario. It is difficult to evaluate the impact of increased motor vehicle traffic on communities in the major zone of influence.

## Cultural

6 - mentions on P. 9-22, sec. 9.3.5 that DOE, regarding cultural resources mitigation measures, would "[c]onduct preconstruction surveys to ensure that work would not affect important archaeological resources and to determine the reclamation potential of sites." This statement should emphasize avoidance of significant sites. What is the "reclamation potential" of archaeological sites?

**Wilderness Values**

- 7 - may have overlooked wilderness values under the potential Caliente-Chalk Mountain rail route. According to your map (Figure 2-48), it looks like the Caliente Rail Corridor would possibly pass through Weepah Spring Wilderness Study Area (WSA). If it does not pass through the WSA, this would be the preferred route of the Ely Field Office.

**Weeds**

- 8 - fails to include a detailed analysis (P. 6-10, sec. 6.1.2.4) of potential impacts from the spread of noxious or invasive weeds in regards to transportation, heavy-haul highway improvement, and other possible activities. BLM's core mission is to maintain or improve the health of the land. It is the BLM's policy to include an analysis of the potential for weed spread and establishment as an environmental consequence in all NEPA documents. Additionally, Executive Order 13112 states, in part, that no Federal agency shall authorize, fund or carry out actions that it believes are likely to cause or promote the spread of invasive weed species unless, pursuant to guidelines that it has prescribed that the benefits of the action outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk or harm will be taken in conjunction with the actions.